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Ravines de Schur et al v. Bernsten et  
al

## In The United States District Court For the District of Utah

Ana Maria Ravines de Schur  
Nathan Schur  
Jessica Johannes

Plaintiffs,

VS

Lori Berntsen  
Coleman Plummer

Defendants,

CIVIL CASE

[DEMAND FOR JURY TRIAL]

### **COMPLAINT AND DEMAND FOR JURY TRIAL**

The plaintiffs allege as follows:

1. Plaintiffs call upon the court to enforce 22. U.S.C. § 7102(9), 18 U.S. Code § 249, 18 U.S. Code § 241, 18 U.S. Code § 1512, 15 U.S. Code § 1692d, 31 U.S. Code § 6711, 18 U.S. Code § 873, 15 U.S. Code § 1692d as Lori Berntsen and Coleman Plummer have shown evidence of sex trafficking, and labor trafficking, harassment, hate crimes. Plaintiffs ask for restitution and reparations of a total of \$479,000.00.

### **JURISDICTION AND VENUE**

2. This Court has jurisdiction over this action under 28 U.S.C. §§ 1331 and 1345, 15 U.S.C. § 1691e(h). Venue is proper in this district under 28 U.S.C. § 1391(b) because the actions and omissions giving rise to the allegations occurred in the State of Utah, and the defendants Nathan Schur and Ana Maria Ravines de Schur are citizens of Germany and Jessica Johannes resides in Colorado and the total restitution demanded is larger than \$75,000.00.

### **FACTUAL ALLEGATIONS**

3. Between 2019 and 2021 Lori Bernstein and Coleman Plummer operated a dating page on dating applications called Tinder and Bumble. Ms. Berntsen and Mr. Plummer used these dating pages to lead Nathan Schur to believe he would be given friendships, job

opportunities, and that Lori wanted to have a relationship. Ms Berntsen stated that she was interested in having Nathan Schur perform general repairs on and around her condominium as well as have Nathan Schur give her massages. Nathan Schur then was sex trafficked and abused for sexual acts at Lori Berntsen's direction.

4. Lori Berntsen violated 22. U.S.C. § 7102(9). On October 6, 2019, Lori Berntsen indicated via text message that Nathan Schur could come to her residence to give her a professional massage. After a 90-minute-massage at her residence, Ms. Berntsen then indicated that Nathan should perform a sexual act. Prior text messages between Nathan Schur and Lori Berntsen indicated that Nathan Schur did not intend to perform any sexual acts or want to participate in such acts with Ms. Berntsen. There are audio and video recordings to support the events of this day. Evidence also indicates that Ms. Berntsen then also sexually assaulted Nathan Schur and touched his genitals. Ms. Berntsen admitted via text message on November 2, 2019 to Nathan Schur indicating that she is trying to find "pussy slaves." Ms. Berntsen stated that she had severe migraines and that doctors could not reduce her migraines. Ms. Berntsen then stated that she finds men on the two dating apps in order to have them perform sexual acts primarily oriented around leading her to have orgasms to reduce her migraines. Ms. Berntsen also indicated that she fails to inform her victims of the fact that she has a sexually transmitted disease HPV and spreads it to her victims unbeknownst to their knowledge. Ms. Berntsen admitted be blackmailing these victims by threatening to inform their girlfriends and spouses of the HPV in order to keep her victims coming to her residence to perform these sexual acts for her own pain relief and financial benefits to save on medical bills. This shows intent by Lori Berntsen and Coleman Plummer attempting to reintroduce slavery into the United States in the form of sexual slavery.

5. Lori Berntsen violated 18 U.S. Code § 249. Lori Berntsen has stated that her sexual partners were primarily African-American males, whom she calls “slaves” or “pussy slaves.” Nathan had collected the evidence of Lori Berntsen sexually assaulting Nathan and demanded that Lori leave him alone. Ms. Berntsen then filed a police report with forged images and claimed that Nathan had hid cameras in her apartment with her new African-American boyfriend. After Lori Berntsen filed a false police report, she filed a protective order and mislabeled Nathan as being “black.” Ms. Berntsen purposely mislabeled his race so that police officers and law enforcement would be more violent toward him when they encountered him or served him the protective order. This was happening while there were intense disputes in the United States over police brutality against African-American men.
6. Lori Berntsen and Coleman Plummer violated 18 U.S. Code § 241. Lori Berntsen indicated that she is of German descent and how she has access to guns that are registered to her sister as well as a gun registered to her African-American boyfriend. Lori Berntsen has threatened Nathan Schur with guns registered to another person. On April 21st, 2020, after Nathan Schur was invited into Lori Berntsen’s apartment, Lori Berntsen had a German flag hanging from her shelf in her living room. Lori Berntsen then had a conversation with Nathan Schur about how he is an immigrant from Germany and he got political asylum after he was fleeing violence from Germany. Lori Berntsen, having German pride, shows a conflict of interest and her intent to take his green card away and get Nathan deported away from his family, all refugees living in the United States. Lori Berntsen and Coleman Plummer then filed a protective order against Nathan Schur making him fear for his safety inside the state of Utah. Nathan stated he has never met Coleman Plummer. Since Nathan has never met Coleman, he does not know his physical posture or appearance. We believe that Lori Berntsen is working with Coleman Plummer to use her sister’s guns to kill Nathan Schur by claiming that he broke a

protective order and Coleman being allowed to execute Nathan Schur with these guns in a false claim of self-defense. Lori Berntsen has already shown homicidal intentions by spreading her HPV to her victims without their knowledge and letting them die of cancer.

7. Lori Berntsen and Colman Plummer violated 18 U.S. Code § 1512, intimidating Nathan Schur and his family in their political asylum case and privacy standards for the protection of the Schur family. She attempted to induce further conflicts that have been intensified by the fact that the father of Nathan Schur is a German federal worker in Germany. The upcoming events continued to intensify the feelings of anxiety and fear of losing their protected status in the United States, as Berntsen kept threatening to block the family's refugee status.
8. Lori Berntsen violated 15 U.S. Code § 1692d. Lori Berntsen made references to having access to her sister's guns as well as a gun registered to her African-American boyfriend and Lori Berntsen intending to use them against Nathan Schur. On September 17th, 2018, Lori Berntsen made an additional reference to her African-American boyfriend's gun via text message. On May 18th, 2020 Lori Berntsen had again referenced the guns again and sent Nathan Schur messages about having access to her sister's guns and intending to use them against Nathan Schur. These messages were seen by Jessica Johannes. On October 1st, 2020 Jessica Johannes was chauffeuring Nathan Schur to his initial appearance for charges filed by Lori Berntsen, Jessica Johannes suffered from a panic attack due to the threatening message that Lori Berntsen sent to Nathan Schur and video footage of Lori assaulting Nathan. Jessica lost control of the vehicle crashing into a median and totaling the vehicle. Jessica Johannes suffers from PTSD from the accident and witnessing the video footage of Nathan Schur being sexually assaulted and abused by Lori Berntsen. Jessica Johannes' therapist can confirm that she has had to go through therapy over the accident and related trauma for over a year and that the accident and trauma has affected her in an adverse manner.

9. Lori Berntsen violated 31 U.S. Code § 6711 and 18 U.S. Code § 873. As a consequence of the Berntsen's persecution of the family under said objectionable practices of sexual harassment and sex trafficking and blackmail, the Schur family members are currently suffering from retraumatization. The family is currently in need of professional therapy and finding a safe space. Lori Berntsen, has restricted the Schur family members' sense of safety in a predominantly Caucasian state by Lori Berntsen's threats of gun violence, blackmail, and harassment.
10. Lori Berntsen violated 18 U.S. Code § 873. Plaintiff's family and her sons live in the United States under USCIS Protected Status. The family was granted Political Asylum in 2002. Nathan obtained his green card in 2015, and Lori Berntsen is now attempting to put a hold on the progression of his citizenship with her attempts to turn Nathan Schur into a sexual slave. Nathan Schur does not wish to maintain any contact with Lori Berntsen, but she has legally tied herself to him with a protective order that the commissioner did not want to enforce due to lacking evidence. Nathan is afraid to enter the state of Utah because he fears that he could accidentally encounter Lori or her son Coleman and that Lori Berntsen could commit an act of violence against him, after she has stated that she has access to her sister's guns to use against Nathan as well as a gun registered to Lori Berntsen's boyfriend.
11. Lori Berntsen violated 18 U.S. Code § 873. Lori Berntsen had the opportunity to leave Nathan Schur in peace, however she has continued harassing and asking him for sexual favors. Two witnesses have confirmed seeing the conversations as they were happening during the night of November 13, 2019 when Lori Berntsen asked Nathan to come to her residence and then changed her mind multiple times. Lori Berntsen is using her protective order to turn plaintiff Ana Maria's son into a sexual slave by induction of fear to have him deported. She has proven that she is willing to break her own protective order by contacting him after she filed the initial no-contact order and led the police to believe

that the entire conversation in which Lori Berntsen did not inform Nathan Schur that she had filed a no-contact order, was an accident. Between 2019 to 2020 while Lori Berntsen was running her dating page on Tinder and Bumble in association with Coleman Plummer, where Coleman is seen holding the camera and taking the picture with Lori Berntsen behind him; and since Lori Berntsen matched and found Nathan Schur through these dating services, indicating that her son Coleman Plummer helped Lori Berntsen to find victims such as plaintiff's son, young men of color that she can continue to misuse in her sex trafficking activity. Plaintiffs have well founded reasons to add Coleman Plummer to this complaint as a second respondent.

12. Lori Berntsen violated 15 U.S. Code § 1692d and 18 U.S. Code § 241. Plaintiffs live with family under Protected Status in the United States since 2002 and to prevent any further intrusions from Lori Berntsen in the refugee family's privacy, Lori Berntsen directly threatens the livelihood of the Schur family in the United States with her threats of gun violence and other hostile methods.

13. Lori Berntsen violated 15 U.S. Code § 1692d. Prior to may 2020, Nathan Schur stated that he agreed to leave Lori Berntsen alone, but that she recanted her police threats in order to get him to come to her residence again to perform more sexual acts. Lori Berntsen did not know when to leave Nathan Schur alone. Lori Berntsen stated multiple times via text messages that she had blocked him on her Verizon Wireless phone number. Verizon Wireless does not allow you to send messages to blocked parties. Lori then continued to send Nathan text-messages thereafter and lied about having blocked him and therefore continued to harass him.

**PLAINTIFF DEMANDS FOR REPARATIONS AND PRAYER FOR RELIEF**

We ask that the courts order Lori Berntsen and Coleman Plummer to pay \$479,000.00 for reparations and restitution over hardships and duress and PTSD that she has caused to all parties associated. The demands are as follows:

1. Ana Maria Ravines de Schur has PTSD from the trauma caused by having to witness the stress and duress put on her refugee son over the past year. Ana Maria Schur has had to witness the video footage of Nathan being assaulted by Lori Berntsen and Lori asking Nathan for sexual acts to be performed. Ana Maria Ravines de Schur, being impoverished and on Medicaid, is needing professional trauma therapy and care that Medicaid does not provide. The portion allotted to Ana Maria totalling \$144,000.00 to cover the next 10 years for the therapy needed for Ana Maria Ravines de Schur at the standard rate of one weekly visit of \$150 per week.
2. Jessica Johannes is having to see a psychiatrist over the accident and being traumatized by Lori Berntsen's threats against Nathan Schur. We believe Jessica Johannes needs therapy paid for for the next 10 years; totalling \$151,000.00 Jessica's insurance premiums have increased due to the accident. Nathan Schur is suffering from PTSD and is afraid of any sexual contact with woman as he fears abuse by women due to Lori Berntsen's aggressive, demanding and enslaving behavior. Jessica had to pay \$1200 out-of-pocket for the ambulance ride on October 1, 2020. Jessica also had to cover \$1000 of the \$6000 hospital visit on October 1, 2020.
3. Nathan Schur also suffers from PTSD due to fears of being deported away from his family over Lori Berntsen's threats and intimidation. Nathan requires therapy to deal with the issues that Lori Berntsen has created for Nathan mentally. We



are asking for 144,000.00 for the next 10 years. Multiple violations have affected the plaintiff Nathan Schur's family integration as refugees to the United States through violations instigated by State of Utah contractors to the Federal Government. These violations were caused by acts of demonstrable xenophobia, nepotism, corruption, malfeasance and most recently through acts of persecution incited by Lori Berntsen.

4. Plaintiffs ask that defendants pay for a federal attorney to represent all three plaintiffs, Ana Maria Ravines de Schur, Nathan Schur, and Jessica Johannes as well as all associated legal fees and related expenses totaling \$40,000.00.

Plaintiff is providing sufficient evidence containing communication trails and videographic and audio evidence.

#### **JURY DEMAND**

The plaintiffs demand a trial by jury of all issues so triable pursuant to Rule 38 of the Federal Rules of Civil Procedure.

Respectfully submitted:  
January 3, 2022



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